

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Western District of Texas

Filed

06/05/18  
Clerk, U. S. District Court  
Western District of Texas

By

Deputy

United States of America )

v. )

JOSEPH GONZALEZ(1),  
CHRISTOPHER LEON (2), and  
BRANDON MORRIS (3), )

Case No.

SA18-MJ-743

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of JUNE 4, 2018 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

## Code Section

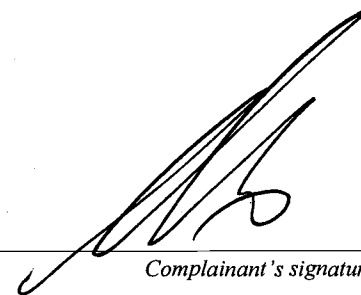
21 U.S.C. 846, 841(a)(1) & 841(b)  
(1)(A)(viii)

## Offense Description

Conspiracy to Possess with intent to Distribute 500 grams or more of a  
mixture or substance containing Methamphetamine, a Schedule II controlled  
substancePENALTIES: Mandatory minimum 10 years confinement, Maximum life  
imprisonment \$10,000,000 fine, minimum of 5 years supervised release, \$100  
mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Bryan Smith, TFO DEA

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/5/2018



Judge's signature

City and state: San Antonio, Texas

RICHARD FARRER, U.S. Magistrate Judge

Printed name and title

### AFFIDAVIT FOR CRIMINAL COMPLAINT

Affiant Bryan Smith is a Texas Peace Officer and has been employed with the Bexar County Sheriff's Office for over 15 years. Affiant is currently assigned to the Bexar County Sheriff's Office Narcotics Section and is also assigned as a Task Force Officer with the Drug Enforcement Administration (DEA) San Antonio District Office. Affiant has participated in State and federal search/arrest warrants and narcotics related cases, and has made numerous arrests for narcotics violations which have resulted in successful prosecutions. Affiant has personally participated in this investigation, and is thoroughly familiar with the information contained in this affidavit, through personal investigation and/or through discussions with other law enforcement personnel.

On June 4, 2018, members DEA Group D54 were conducting surveillance at a residence on Readwell Drive in San Antonio, Texas. Joseph GONZALEZ was the person said to be living at the residence and distributing kilogram quantities of crystal methamphetamine from the residence. Surveillance observed GONZALEZ and Jenny BONDS walk out of the residence and enter a black Lexus sedan. GONZALEZ was in the driver seat while BONDS was in the front passenger seat. GONZALEZ departed the residence and traveled towards Loop 410 South and eventually onto IH 37 South. Surveillance units maintained a constant visual of GONZALEZ during his travels and he was not observed stopping anywhere. Additional surveillance maintained surveillance of the residence on Readwell Drive.

Deputy Gustavo Trevino and Deputy Carl Davis were in a marked Bexar County Sheriff patrol unit. Deputy Trevino observed GONZALEZ commit the traffic violation of failure to maintain a single lane of travel on IH 37 South near Southton Road. Deputy Trevino activated his emergency lights and siren and attempted to initiate a traffic stop on the vehicle. GONZALEZ refused to stop his vehicle and led patrol units on a two (2) mile chase, ultimately coming to a stop just south of Donop Road.

Deputy Trevino informed Affiant, he witnessed GONZALEZ reaching towards the passenger side floorboard of the vehicle during the pursuit. Deputy Trevino advised he could smell the strong odor of marijuana emitting from inside of the vehicle. Deputy Trevino and Deputy Davis both stated they observed a large amount of loose crystal methamphetamine scattered on the front passenger side floorboard where BONDS sat. Approximately 58.0 grams of crystal methamphetamine was recovered from the front passenger floorboard. Approximately 38.8 grams of marijuana in a clear plastic baggie was recovered from the driver's side floorboard where GONZALEZ was seated. A 9 mm firearm was also recovered in BONDS's purse.

GONZALEZ was placed in the back seat of the patrol vehicle and was read his Miranda Rights by TFO Smith and witnessed by TFO David Camacho. GONZALEZ requested legal counsel and all interviewing stopped. BONDS was placed in the back seat of an unmarked vehicle. TFO Camacho read BONDS her Miranda Rights as witnessed by TFO Smith. BONDS stated she agreed to cooperate with law enforcement. BONDS stated that during the pursuit, BONDS

observed GONZALEZ call an unknown person and advise them that GONZALEZ was in a pursuit with law enforcement. BONDS stated that GONZALEZ removed a firearm from his person and placed the firearm in BONDS's purse. GONZALEZ directed BONDS to remove the loaded magazine from the firearm. According to BONDS, GONZALEZ threw the crystal methamphetamine on the passenger floorboard and directed BONDS to stomp the crystal methamphetamine into the floor mats while pouring Gatorade on it in an attempt to get rid of any evidence of the crystal methamphetamine.

While obtaining approval for a search warrant for the residence on Readwell Drive, the surveillance team at the residence observed a silver 2006 Mitsubishi Galant arrive at the residence. The driver, Christopher LEON, exited the vehicle and entered the residence. A short time later, LEON and Brandon MORRIS were observed exiting the residence with a safe and three firearms in hand. LEON and MORRIS each placed the safe and firearms inside the vehicle. After doing this, LEON and MORRIS entered the vehicle and departed the residence. Contact was made with LEON and MORRIS and both were found to be in possession of three (3) firearms, approximately 40.9 grams of crystal methamphetamine, and a locked black safe. TFO David Ricks read LEON his Miranda Rights as witnessed by SA PJ Wintson. LEON stated he understood his rights and agreed to cooperate with law enforcement. LEON stated that the safe did not belong to him.

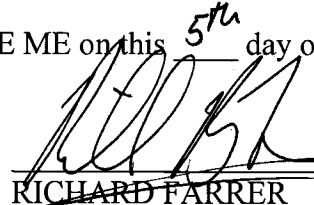
Affiant obtained search warrants for the residence and for the safe. During the execution of the search warrant at the residence no illegal contraband was located. The safe contained approximately 2.5 kilograms of crystal methamphetamine and an undetermined amount of US Currency. During the interview with LEON, he stated he was contacted by GONZALEZ, via phone, and was told GONZALEZ was in a chase with police and GONZALEZ had a "strap" and "work" on his person. Affiant knows through his training and experience that a "strap" is slang for a firearm and "work" is slang for illegal narcotics.

GONZALEZ told LEON to drive to his house. LEON knew this to mean to remove GONZALEZ's illegal narcotics and firearms from the residence. LEON said he arrived at the residence and met with MORRIS. MORRIS had the black safe containing the narcotics and US Currency. LEON said he walked inside and retrieved the firearms. LEON said MORRIS assisted LEON with loading all the items into the Mitsubishi. LEON told Affiant that he knew illegal narcotics were inside the safe and he was planning to store the safe at his residence.

MORRIS was read his Miranda Rights as witnessed by GS William Armstrong as witnessed by SA PJ Winston. MORRIS stated he understood his rights and agreed to cooperate with law enforcement. MORRIS provided the same details as given by LEON.

  
\_\_\_\_\_  
Bryan Smith, TFO  
DEA – San Antonio District Office

SWORN TO AND SUBSCRIBED BEFORE ME on this 5<sup>th</sup> day of June, 2018.

A handwritten signature in black ink, appearing to read 'R. Farrer', is written over a horizontal line.

RICHARD FARRER  
U.S. MAGISTRATE JUDGE